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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DARMANJOT SINGH,

Defendant.

Case No: 1:24-CR-00098-JLT-SKO

**STIPULATION BETWEEN THE UNITED
STATES AND DEFENDANT REGARDING
PRODUCTION OF PROTECTED
INFORMATION; PROTECTIVE ORDER RE:
SAME**

WHEREAS, This Court may enter protective orders pursuant to Fed. R. Crim. P. 16(d), 18 U.S.C. §§ 3509(d)(3) and 3771(a), and its general supervisory authority.

WHEREAS, the discovery in this case contains information pertaining to confidential informants participating in ongoing criminal investigations, specifically, the documents with bates numbers SINGH_ATTORNEYS_EYES_ONLY_00000001 through SINGH_ATTORNEYS_EYES_ONLY_00000012 (the “Protected Information”); and

1 WHEREAS, the parties desire to avoid both the necessity of redactions and the unauthorized
2 disclosure or dissemination of this information to anyone not a party to the court proceedings in this
3 matter;

4 The parties agree that entry of a stipulated protective order is therefore appropriate.

5 THEREFORE, defendant DARMANJOT SINGH, by and through his counsel of record, Tim
6 Hennessy ("Defense Counsel"), and the United States of America, by and through Assistant United
7 States Attorneys Antonio Pataca and Calvin Lee, hereby agree and stipulate as follows:

8 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
9 Criminal Procedure, and its general supervisory authority.

10 2. This Order pertains to all discovery provided to or made available to Defense Counsel as
11 part of discovery in this case (hereafter, collectively known as "the discovery").

12 3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share the
13 Protected Information with anyone other than Defense Counsel's attorneys, designated defense
14 investigators, designated defense experts, and support staff. The defendant may not view unredacted
15 documents.

16 4. The discovery and information therein may be used only in connection with the litigation
17 of this case and for no other purpose. The discovery is now and will forever remain the property of the
18 United States of America ("Government"). Defense Counsel will return the discovery to the Government
19 or alternatively keep it archived within its sole possession at the conclusion of the case.

20 5. Defense Counsel will store the discovery in a secure place and will use reasonable care to
21 ensure that it is not disclosed to third persons in violation of this agreement.

22 7. Defense Counsel shall be responsible for advising the Defendant, employees, and other
23 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

24 8. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to
25 return the discovery to the government, or, at the request of government counsel, to forward it to new
26 counsel after new counsel has confirmed to government counsel in writing his or her agreement to the
27 terms of this Order.

9. Nothing in this Order shall preclude a party from seeking a more restrictive protective order or other court order with regard to particular discovery items.

IT IS SO STIPULATED.

(As auth 11/10/25)

Dated: November 10, 2025

By: /s/ Tim Hennessy
Tim Hennessy
Attorney for Defendant
Darmanjot Singh

Dated: November 5, 2025

Eric Grant
United States Attorney

By: /s/ Antonio J. Pataca
Antonio J. Pataca
Assistant U.S. Attorney

By: /s/ Calvin Lee
Calvin Lee
Assistant U.S. Attorney

ORDER

IT IS SO ORDERED.

Dated: November 10, 2025

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE